

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

*In re BP p.l.c. Securities Litigation*

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No. 4:10-md-02185

This document relates to:

*Alameda County Employees' Retirement Association, et al. v. BP p.l.c. et al.*

No. 4:12-cv-01256 (cons.)

*Avalon Holdings Inc., et al. v. BP p.l.c. et al.*

No. 4:12-cv-03715

*Stichting Pensionenfonds Metaal en Techniek, et al. v. BP p.l.c. et al.*

No. 4:13-cv-00069

*HESTA Super Fund v. BP p.l.c. et al.*

No. 4:13-cv-00129

*Verizon Investment Management Corp. v. BP p.l.c. et al.*

No. 4:13-cv-01044

*New York City Employees' Retirement System et al. v. BP p.l.c. et al.*

No. 4:13-cv-01393

*Arkansas Teacher Retirement System, et al. v. BP p.l.c., et al.*

No. 4:14-cv-00457

*Washington State Investment Board v. BP p.l.c., et al.*

No. 4:14-cv-00980

*Helaba Invest Kapitalanlagegesellschaft mbH, et al. v. BP p.l.c., et al.*

No. 4:14-cv-01065

*Maryland State Retirement and Pension System v. BP p.l.c., et al.*

No. 4:14-cv-01068

*GIC Private Limited v. BP p.l.c., et al.*

No. 4:14-cv-01072

*Pension Reserves Investment Management Board of Massachusetts v. BP p.l.c., et al.*

No. 4:14-cv-01084

*Virginia Retirement System, et al. v. BP p.l.c., et al.*

No. 4:14-cv-01085

*Louisiana State Employees' Retirement System, et al. v. BP p.l.c., et al.*

No. 4:14-cv-01087

<i>IBM United Kingdom Pensions Trust Limited, et al. v. BP p.l.c., et al.</i>	No. 4:14-cv-01279
<i>Universities Superannuation Scheme Ltd. acting as sole corporate trustee of Universities Superannuation Scheme v. BP p.l.c., et al.</i>	No. 4:14-cv-01280
<i>Merseyside Pension Fund v. BP p.l.c., et al.</i>	No. 4:14-cv-01281
<i>The Bank of America Pension Plan v. BP p.l.c., et al.</i>	No. 4:14-cv-01418
	Honorable Keith P. Ellison

### **DEFENDANTS' MOTION FOR JUDGMENT ON THE PLEADINGS**

Pursuant to Rule 12(c) of the Federal Rules of Civil Procedure, Defendants BP p.l.c., BP America Inc., BP Exploration & Production Inc., Anthony B. Hayward, Douglas Suttles, H. Lamar McKay, Robert W. Dudley, and Robert Malone (collectively, "Defendants") respectfully move for judgment on the pleadings in the above-captioned actions.

Defendants move for judgment on the pleadings on the ground that all Exchange Act claims in the pending individual actions based on alleged misstatements more than five years before the filing of the actions are time-barred under the Exchange Act's five-year statute of repose in 28 U.S.C. § 1658(b)(2).

The grounds for this motion are fully set forth in Defendants' Memorandum of Law in Support of Their Motion for Judgment on the Pleadings, filed concurrently herewith.

Dated: February 16, 2018

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing motion has been served by electronic CM/ECF filing, on this 16th day of February, 2018.

/s/ Thomas W. Taylor

Thomas W. Taylor